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April 28, 2010

VIA UPS OVERNIGHT DELIVERY

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960


Re: October 6, 2009, Information Request – Section 308 of the Clean Water Act - Dalton Utilities Land Application System

Dear Ms. Mitchell:

This letter provides information from Dalton Utilities in connection with its ongoing responses to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures are a letter dated April 28, 2010, with a certification signed pursuant to the Request and responses to various Paragraphs of Enclosure A of the Request, **Monthly Progress Report**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL02/31578197v16

2010 MAY 12 A 11:15



April 28, 2010

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Monthly Progress Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting this Monthly Progress Report to you.

Dalton Utilities submitted the Drinking Water Well Survey (Drinking Water Report), Drinking Water Well Monitoring Report, Composted Biosolids Monitoring Plan, Compost Use Review Report, and Well Construction Records on November 4, November 5, November 2, November 2, and October 23, 2009, respectively, in response to the aforementioned Information Request. Additionally, Dalton Utilities submitted revised versions of these documents on January 13, 2010, in accordance with comments from the United States Environmental Protection Agency (EPA) dated December 22, 2009.

With respect to the Drinking Water Well Survey, Dalton Utilities has instituted the quarterly sampling of the seven private drinking water wells shown to have levels of Perfluorooctanoic Acid (PFOA) or Perfluorooctane Sulfonate (PFOS) above the contract laboratory's reporting limit or level of quantification and below the published public health advisory level as well as the two additional wells found to have levels of Perfluorinated Chemicals (PFC) other than PFOA or PFOS above the contract laboratory's reporting limit or level of quantification. All analytical results of these sampling events received to date have been submitted to you. These locations are scheduled to be sampled again in May 2010.

To ensure no additional locations exist in the survey radius, Dalton Utilities requested all available information from the Georgia Environmental Protection Division as they are the governing agency for well drillers in the State of Georgia per the North Georgia Health

District's correspondence (see Attachment A). Per the response from the Georgia EPD, no Intent to Drill forms or additional locations were compiled from this inquiry (see Attachment B).

Additionally, the locations where there were no signs of occupancy during the initial survey, such as foreclosed or abandoned properties, were investigated further in an attempt to contact the property owner and determine if a private well is present at the location. Certified letters were sent to the last known owner or resident. Attachment C is an example of this correspondence. To date, no responses from these locations have been received by Dalton Utilities.

In accordance with the Composted Biosolids Monitoring Plan, Dalton Utilities has sampled the on-site inventory of finished compost twice and submitted all analytical results received to date to you. This sampling is scheduled to be repeated in June and October 2010.

In accordance with the Compost Use Review Report, Dalton Utilities has submitted to EPA all the final analytical reports for this project. The field sketches corresponding to these sampling events are provided herein as Attachment D and include all the available information relative to the sample collections.

Additionally, samples of the locations stipulated in the aforementioned Information Request's Enclosure A, Paragraph 5 were collected as required for the first two quarters and the analytical sample results for these sampling events submitted to EPA. The final quarterly sampling of these locations occurred in April 2010. The final analytical results from this sampling event will be submitted to EPA after receipt.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Cope", written over the printed name.

Don Cope
President & CEO

Attachments (4)

- c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
- Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
- Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
- Lee A. DeHihns, Esq.



DHR

*North Georgia Health District
District 1, Unit 2*

*Harold W. Pitts, M.D., J.D.
District Health Director*

Georgia Department of Human Resources

100 West Walnut Ave., Suite 92
Dalton, Georgia 30720

(706) 272-2342

FAX (706) 272-2221

October 20, 2009

Dena Haverland
Regulatory Compliance Manager
Dalton Utilities
1200 Parrott, Jr. Parkway
P.O. Box 869
Dalton, GA 30722

RE: Request for Intent to Drill Forms

Dear Dena,

I checked with our environmental health offices in Whitfield and Murray Counties. Murray had a few old forms but none for wells within a one-mile radius of the subject property. Whitfield reported having no intent-to-drill forms.

I was working in public health in 1985 when the Georgia Well Water Standards Act was passed. At first we received great numbers of intent-to-drill forms but over the years compliance declined so that now we receive almost none from well drillers. This seems to be the typical condition throughout Georgia unless a county board of health passes a well location ordinance. Georgia EPD is the governing agency for well drillers and intent-to-drill forms.

I'm sorry we could not be of more help. Please call me if you have any questions or if I may otherwise be of assistance.

Sincerely,

Raymond R. King
District Director of Environmental Health

Cherokee (770) 345-7371
Fannin (706) 632-3023

Gilmer (706) 635-4363
Murray (706) 695-4585

Pickens (706) 253-2821
Whitfield (706) 226-2621

Attachment A to April 28, 2010, letter to Ms. Mitchell

Page 1 of 1

Georgia Department of Natural Resources

2 MLK, Jr. Dr, S.E., Suite 1058 East Tower, Atlanta, Georgia 30334-9000

Environmental Protection Division

Water Resources Branch

Linda MacGregor, P. E., Branch Chief

404/675-6232

FAX: 404/675-6247

Reply To:
Regulatory Support Program
Suite 400
19 Martin Luther King, Jr. Dr. S.W.
Atlanta, Georgia 30334-9004
(404) 656-3214

December 17, 2009

Dalton Utilities
Ms. Dena Haverland
P.O. Box 869
Dalton, Georgia 30722

The following is in response to your request for all municipal drinking water wells permitted and Intent to Drill applications received by the Georgia Department of Natural Resources, Environmental Protection Division.

There are no permitted municipal drinking water wells nor applications for Intent to Drill located within the area delineated on the plot map provided. If there are any questions concerning this well survey, please call 404-65-6140.

Sincerely,



Sandra Jo Robertson, P.G.
Geologist III
Wellhead Protection Program



February 26, 2010

[NAME]
[ADDRESS]
[ADDRESS]

Re: Private Drinking Water Well Survey

Dear [NAME]:

Dalton Utilities has identified two chemicals, Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS), in groundwater at our land application site for which the United States Environmental Protection Agency (USEPA) recently issued Health Advisories. USEPA studies of exposure to these chemicals have not shown any adverse health outcomes in humans.

As a precaution after the publication of the health advisory, Dalton Utilities conducted a private drinking water well survey in which the location noted above was identified as possibly having a private drinking water well.

If a private well is used as the primary source of drinking water at the location listed above, please contact Dalton Utilities to schedule a convenient time for us to sample the private well to determine if it has potentially been impacted by these two chemicals.

If you have any questions or to schedule the sampling event, please contact me at 706-529-1010 or dhaverland@dutil.com.

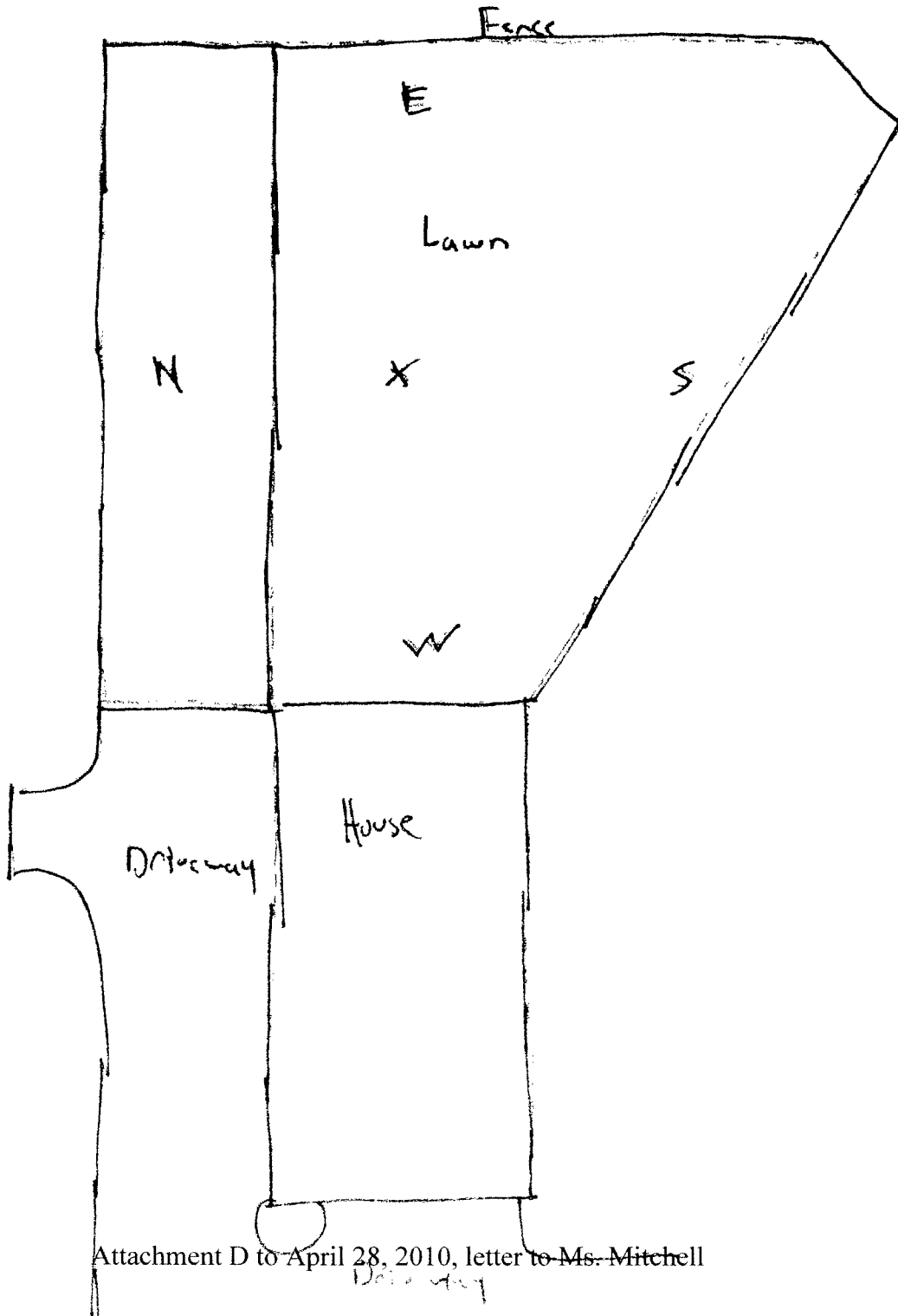
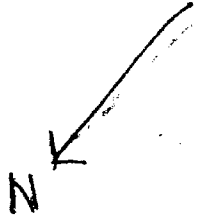
Sincerely,

Dena Haverland
Regulatory Compliance Manager

1975 Hwy 52 East, Chatsworth, GA
Sample ID 102809-1

Lat: -84.74081022 Long: 34.76106702

Soil Types: Unavailable



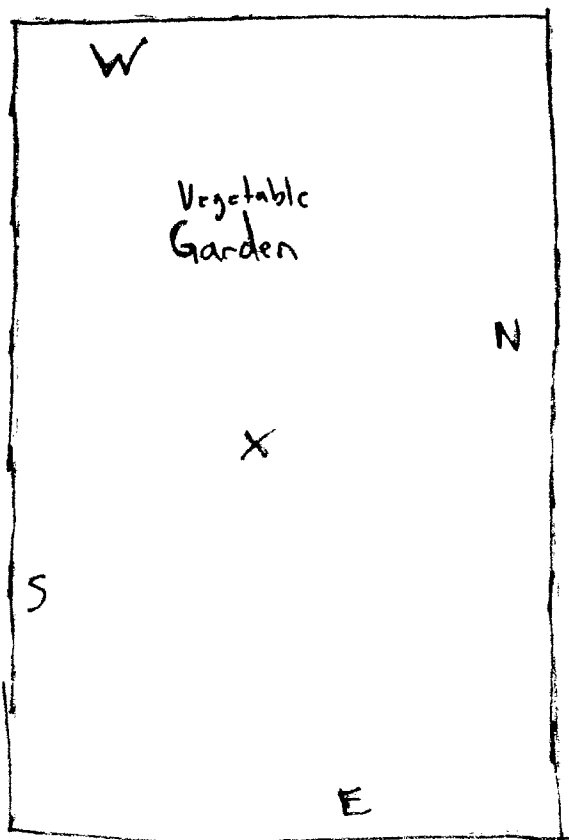
55 South Lake Dr., Chatsworth, GA
102809-02

Lat: -84.74723636 Long: 34.82090832

Soil Type: Unavailable



all
Camp
Rd



Driveway

P.

1727 Dennis Mill Rd , Chatsworth, GA
102809-03

Lat: -84.70737293

Dennis Mill Rd.

Long: 34.68898742

* Private Well located on property. Not shown on diagram.
Well is approximately 200 yds North of garden.

Vegetable
Garden

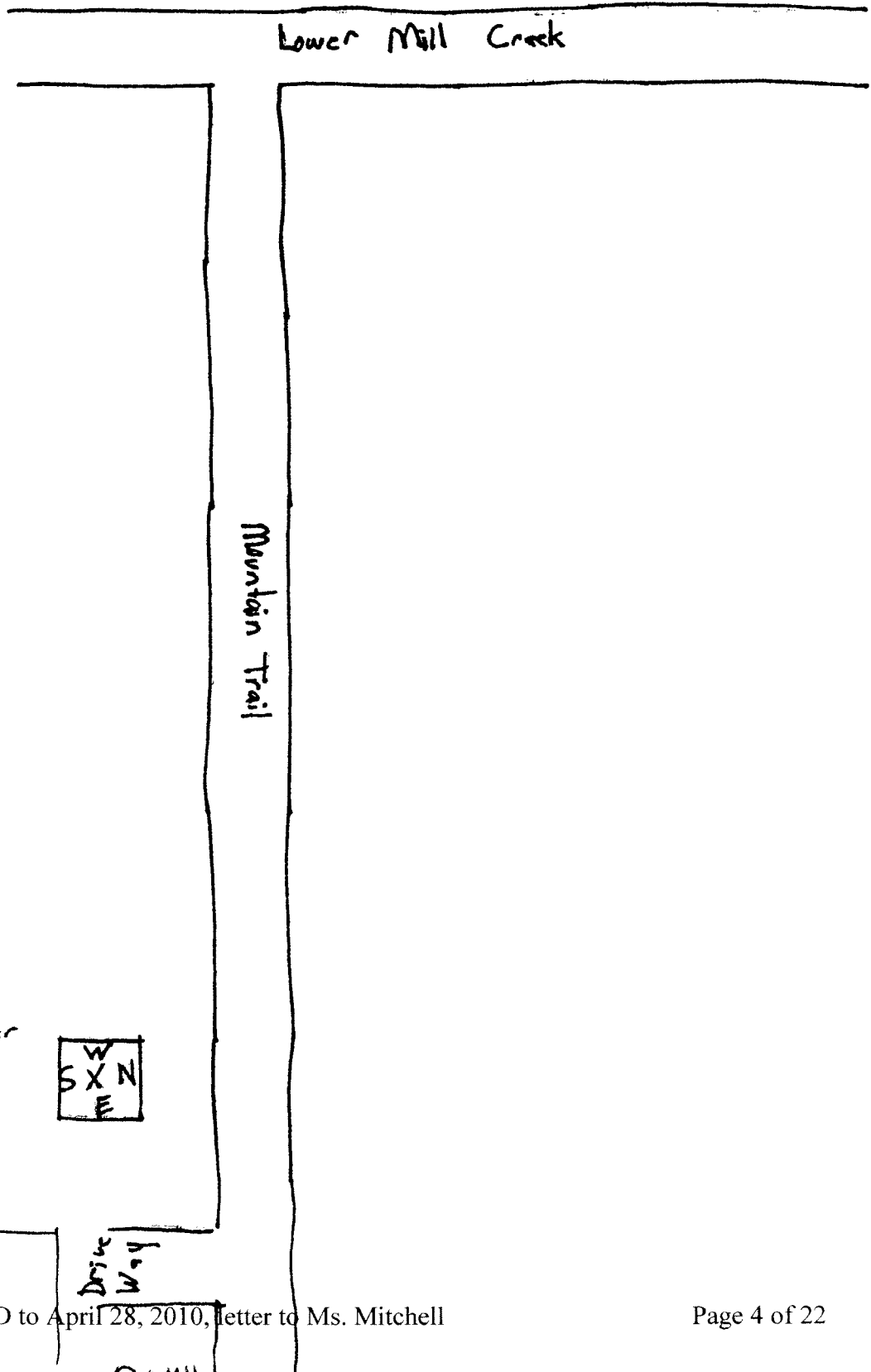


208 Mountain Trail, Lafayette, GA

102809-04

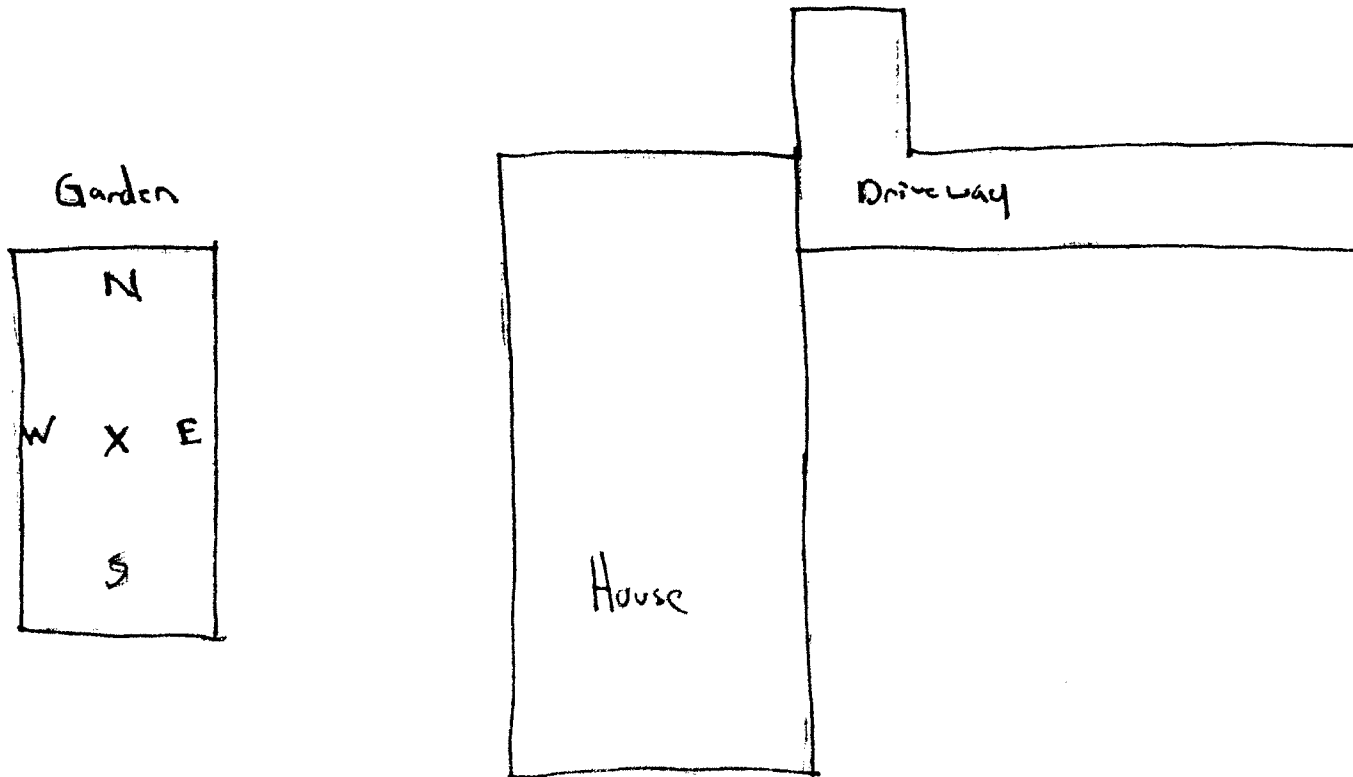
Lat: -85.06374982 Long: 34.68604936

Soil Type: Unavailable



3158 Old Morris Rd, Rocky Face, GA
102609-05

Lat: -85.06533173 Long: 34.72415532



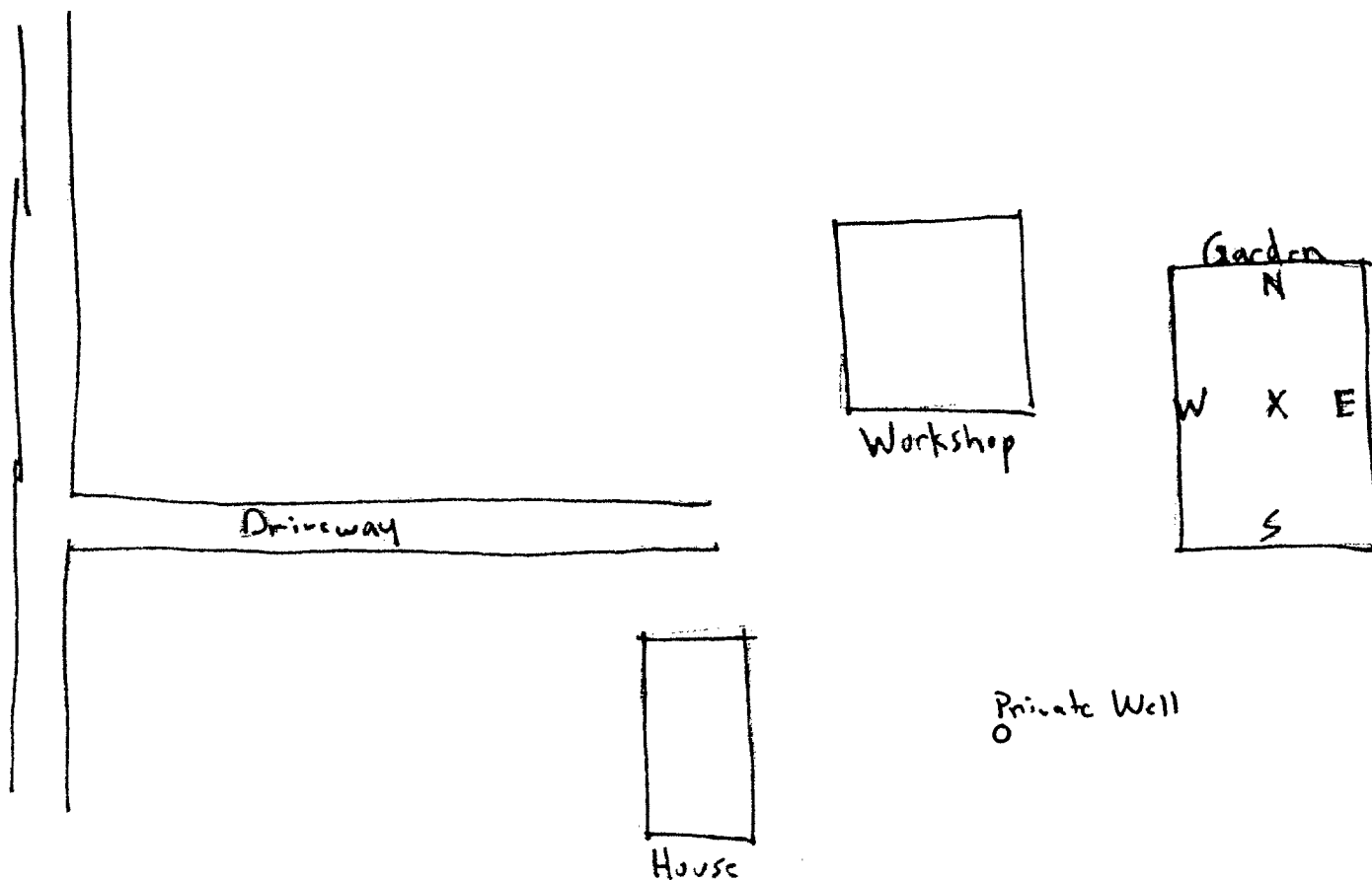
Soil Type: Arkabutla silt loam, occasionally flooded 0-2%

454 Jim Petty Rd, Crandall, GA
103009-1

Lat: -84.7768615 Long: 34.42311954
Soil Type: Unavailable



Jim Petty Rd.

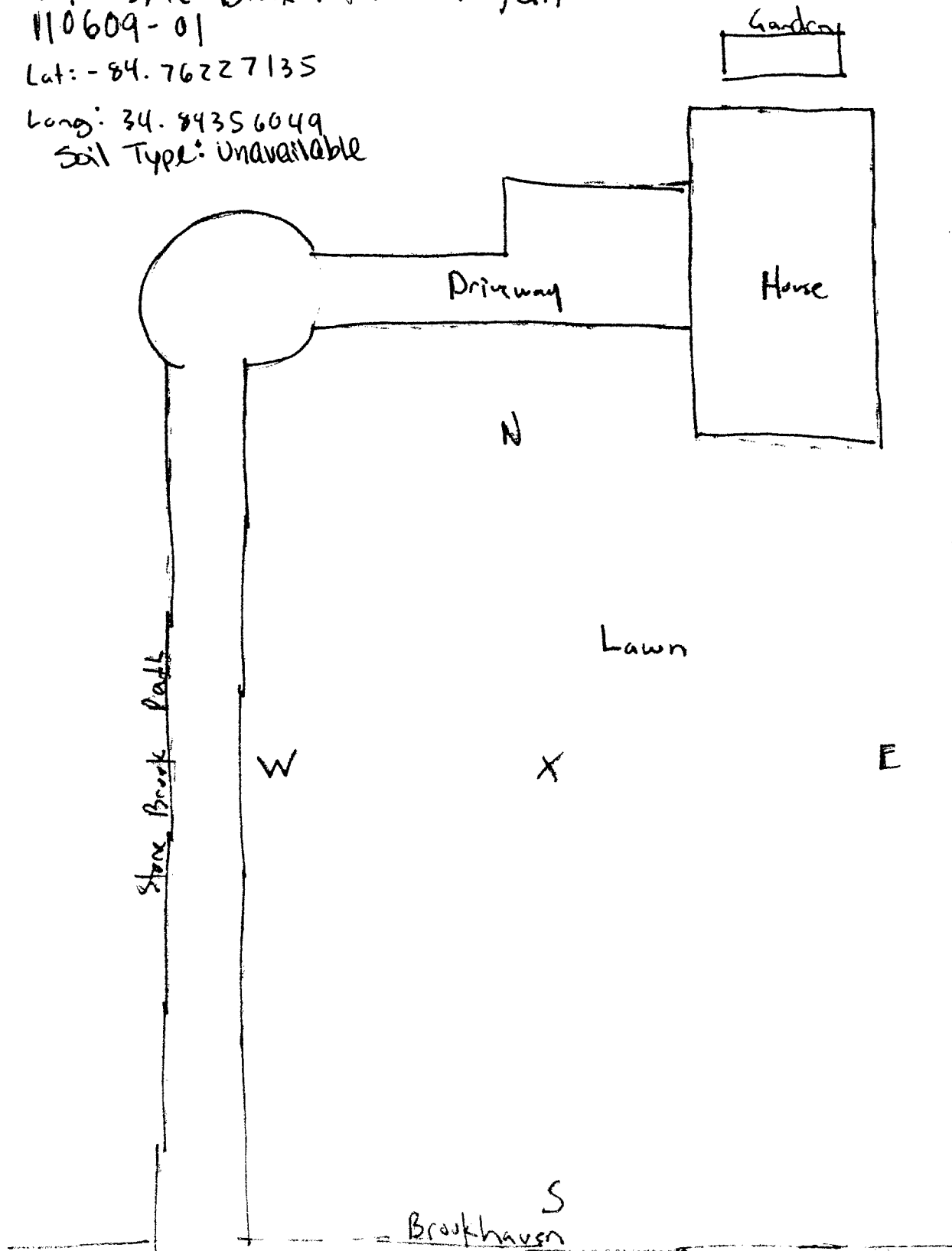


34 Stone Brook Path Eton, GA
110609-01

Lat: -84.76227135

Long: 34.84356049

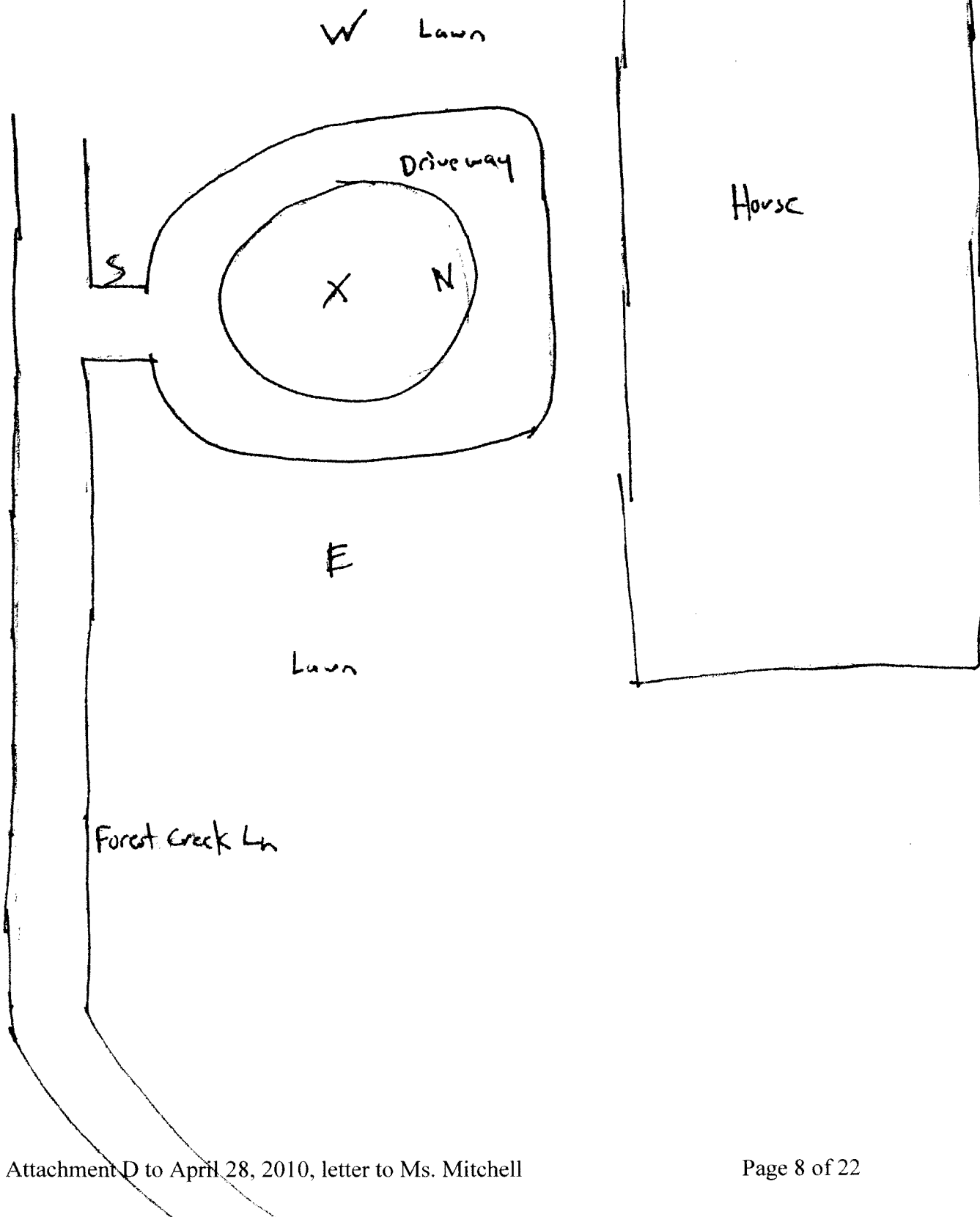
Soil Type: Unavailable



8843 Forest Creek Ln, Ooltewah, TN
110609-02

Lat: -85.06760352 Long: 35.10006713

Soil Type: Unavailable



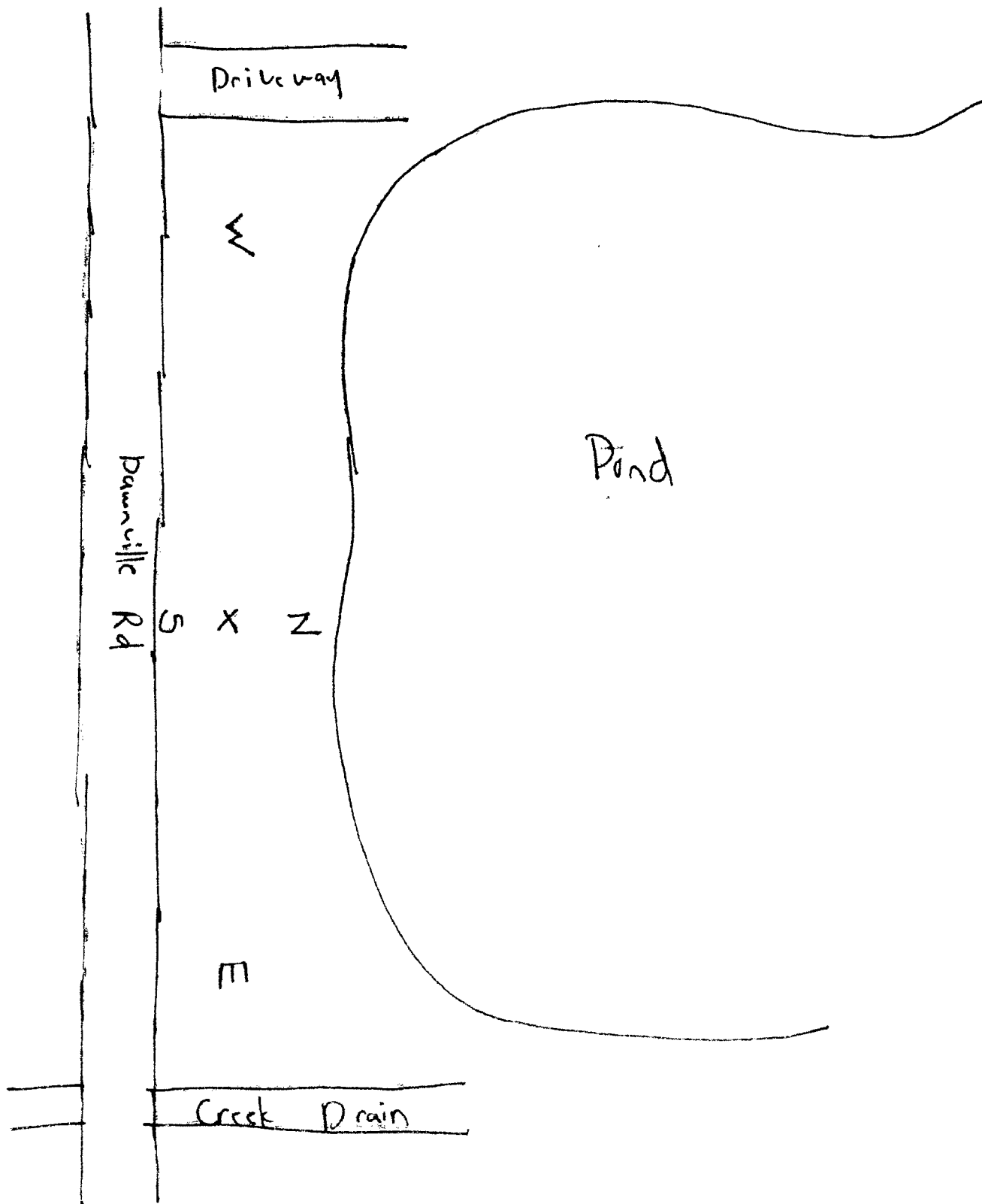
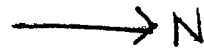
1549 Dawnville Rd

Dalton, GA

111209-01

Lat: -84.87290655

Long: 34.8256822



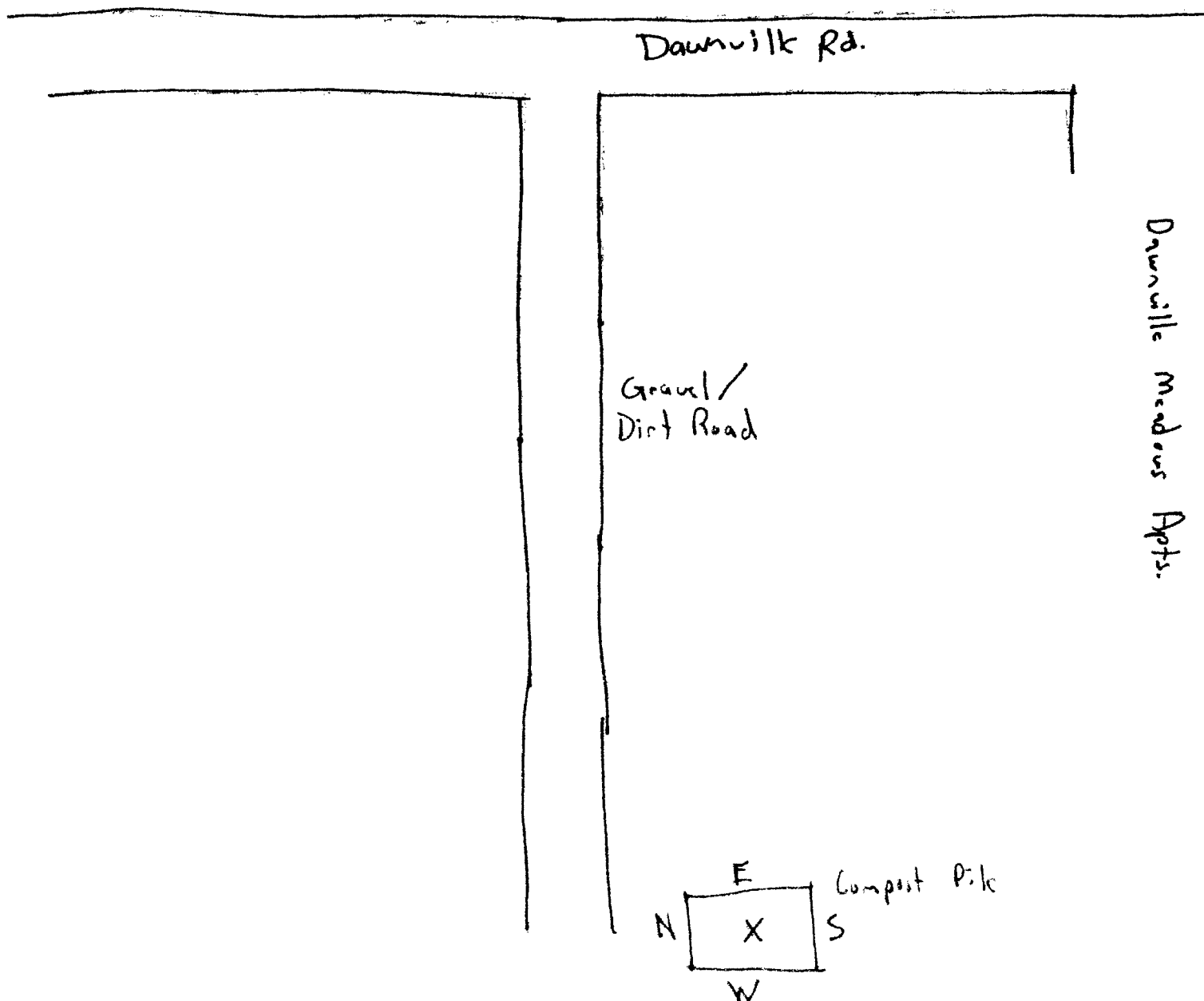
Dawnville Rd, DATHON, GA

111209-02

Lat: -84.94261046 Long: 34.81303875

Soil Type: Townley silt loam 6-15%

N ←

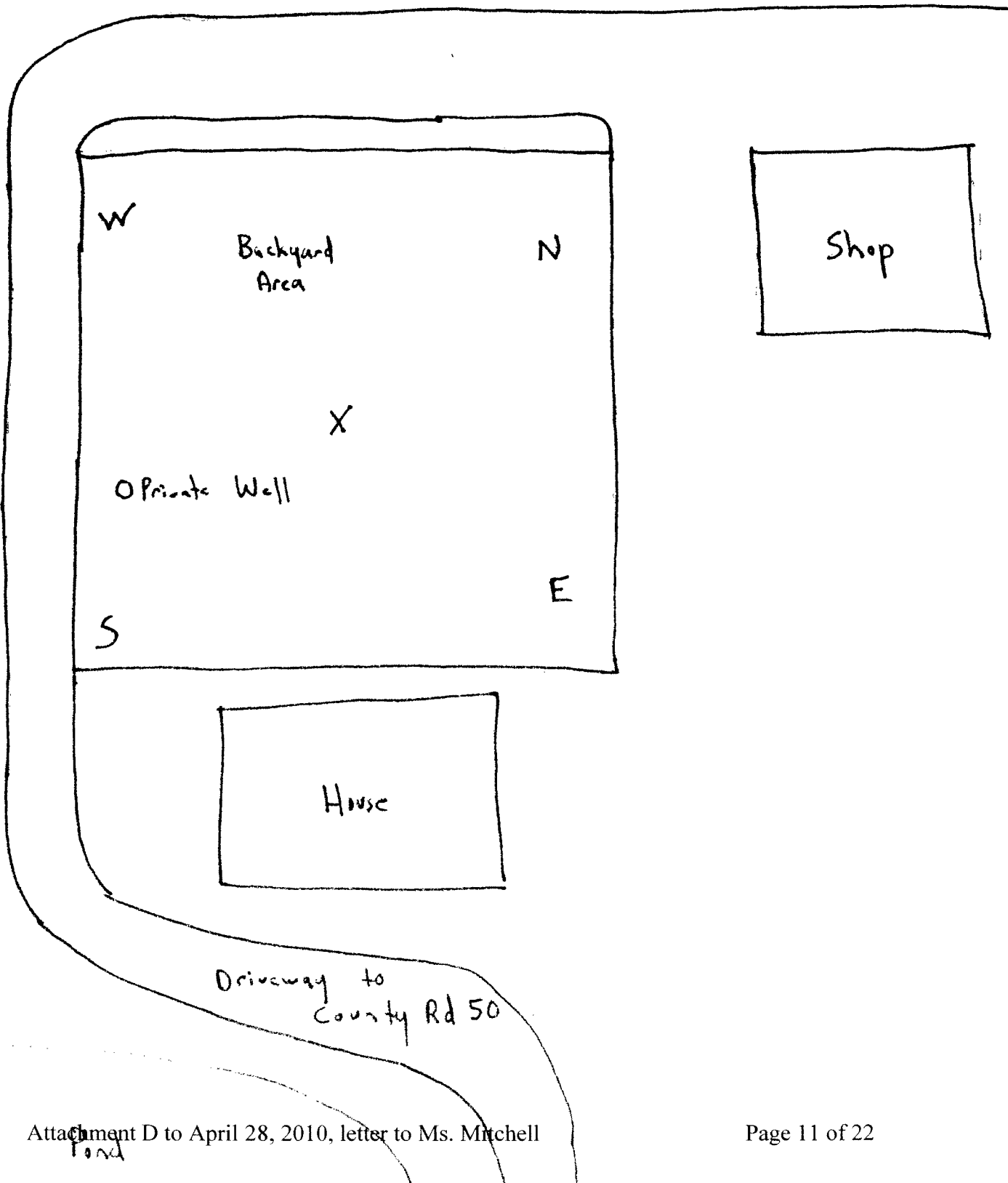


1018 County Rd 50
Athens, TN

Lat: -84.81099201 Long: 35.41185497

Soil Type: Unavailable

Second sample collected 1 mile east in open field.



11-19-09-01

428 Lock N Dam Rd

Jasper, GA

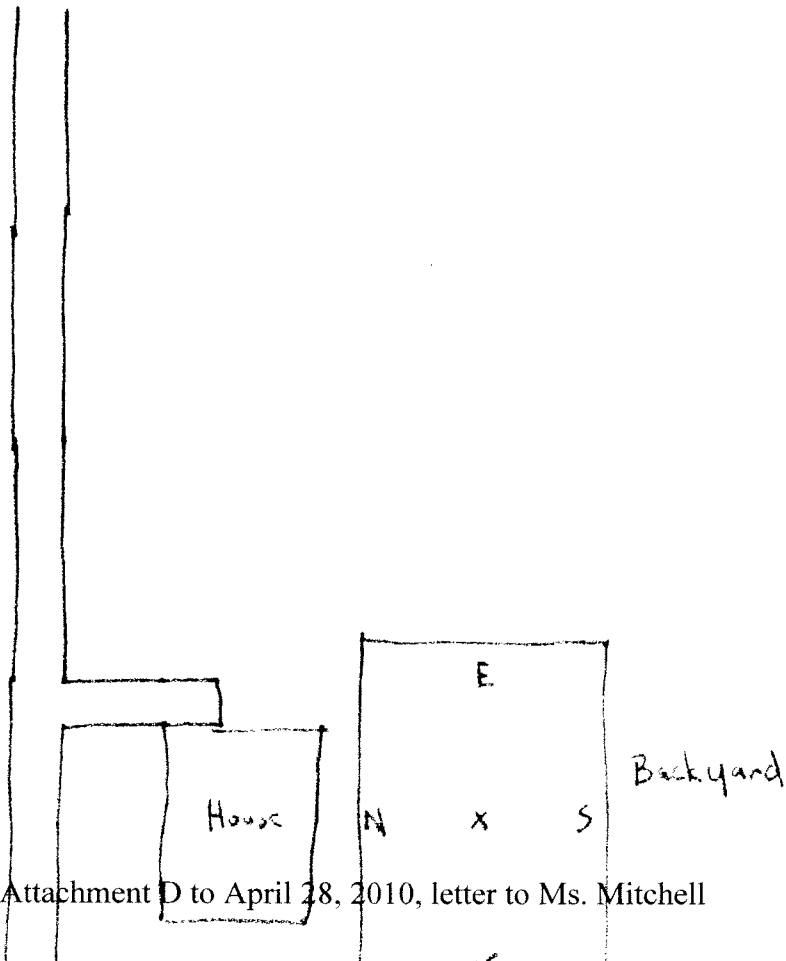
N 35 03.101

W 85 33.099

Soil Types: Unavailable

Nickajack Lake

Lock N Dam Rd

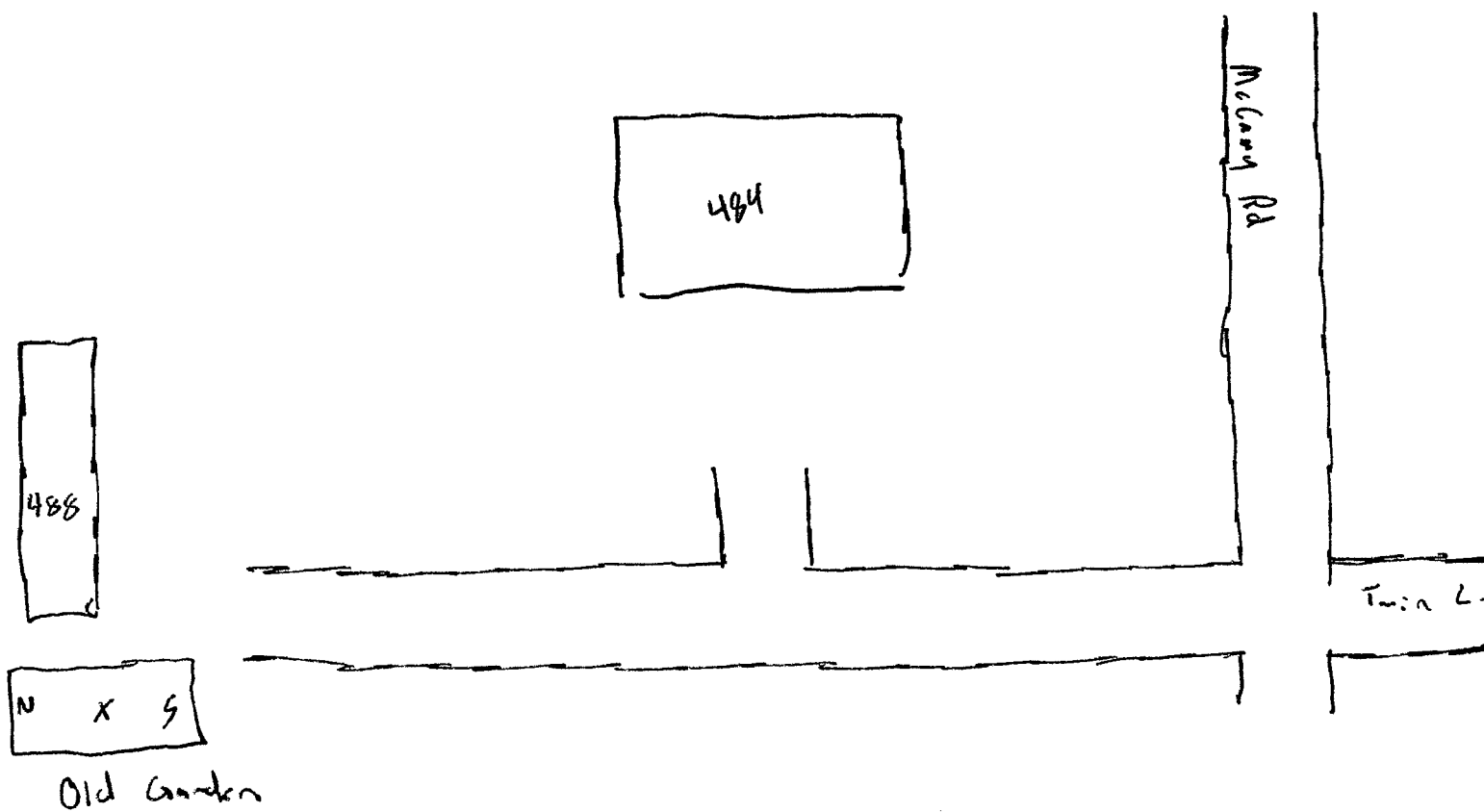


488 McCamy Rd.

Chatsworth, GA

121009-01

Lat: -84.82511008 Long: ~~34.81831493~~ 34.81831493



Soil Type: Docena - Conasauga complex Z-6%

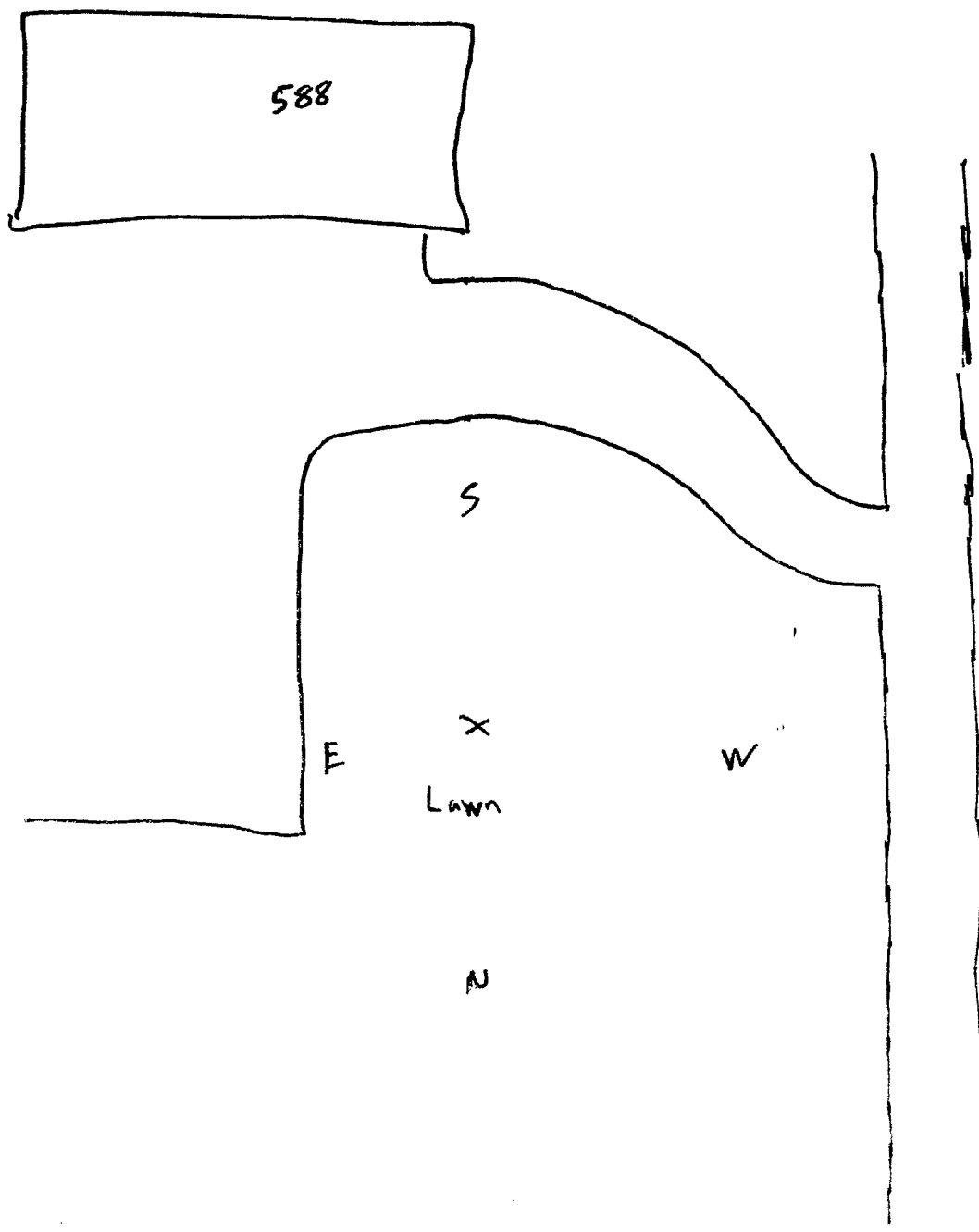
588 Reed Rd

Dalton, GA

121009-02

Lat: -84.97414956 Long: 34.81300837

Soil Type: Waynesboro sandy loam 2-6%



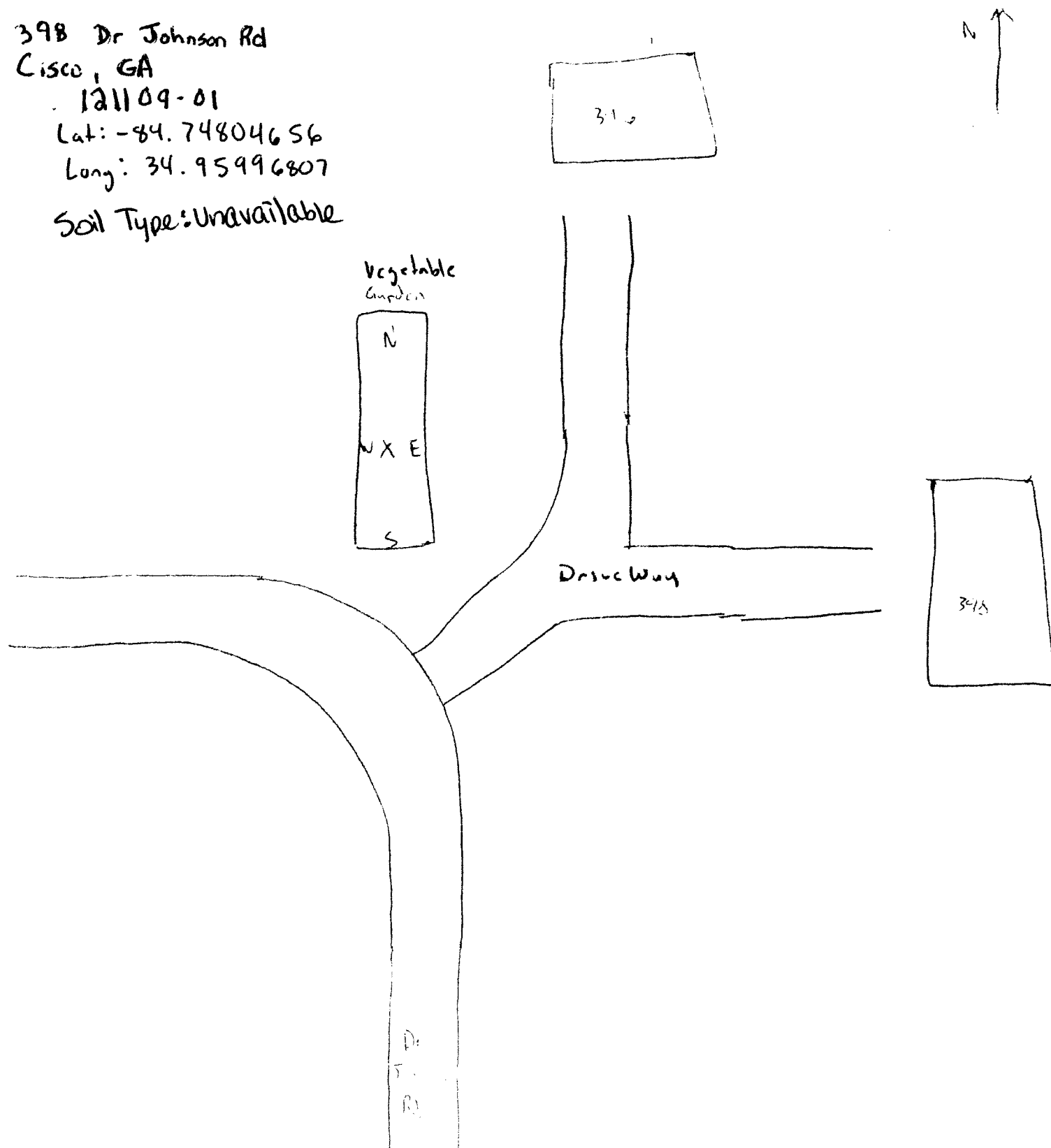
398 Dr Johnson Rd
Cisco, GA

121109-01

Lat: -84.74804656

Long: 34.95996807

Soil Type: Unavailable



4608 Keith Valley Rd

Cohutta, GA

12-11-09-DZ

Lat: -84.86594343 Long: 34.96757508

Soil Type: Unavailable

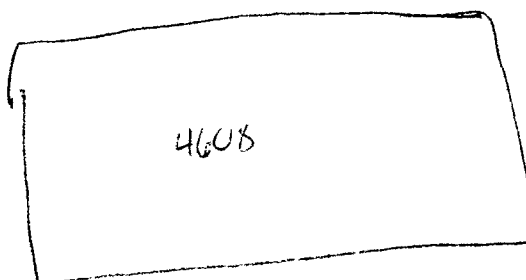
E Lawn

N

X

S

W



Z417 Shaker Dr

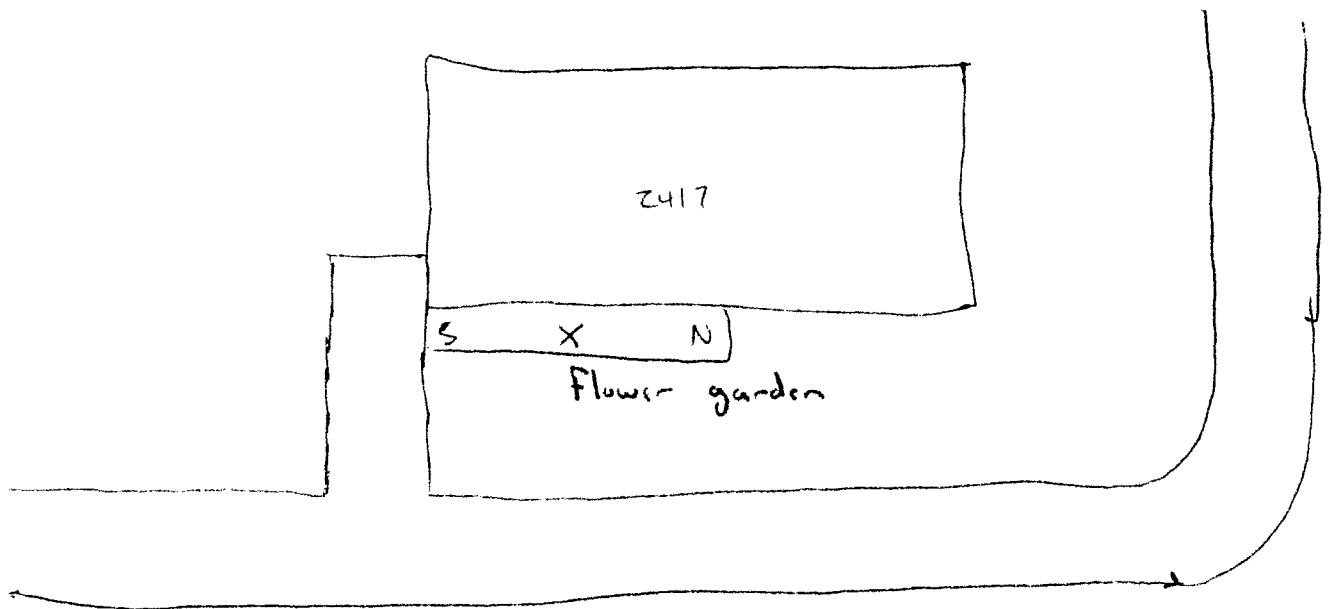
Dallan, GA

121109-03

Lat: -84.9898303 Long: 34.72808776



Soil Type: Arkabutla silt loam, occasionally flooded 0-2%



Thompson Loop Rd.



1723 Pleasant Hill Rd.

Ranger, Georgia

12-1409-01

Lat: -84.773750 Long: 34.573719

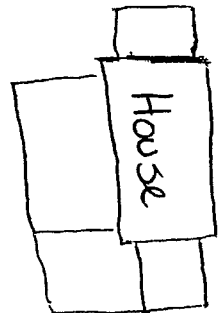
Soil Type: Unavailable

Pleasant Hill Rd.

Driveway

WOODED
AREA

Well



W

E

S

Garden

3451 Cleveland Hwy

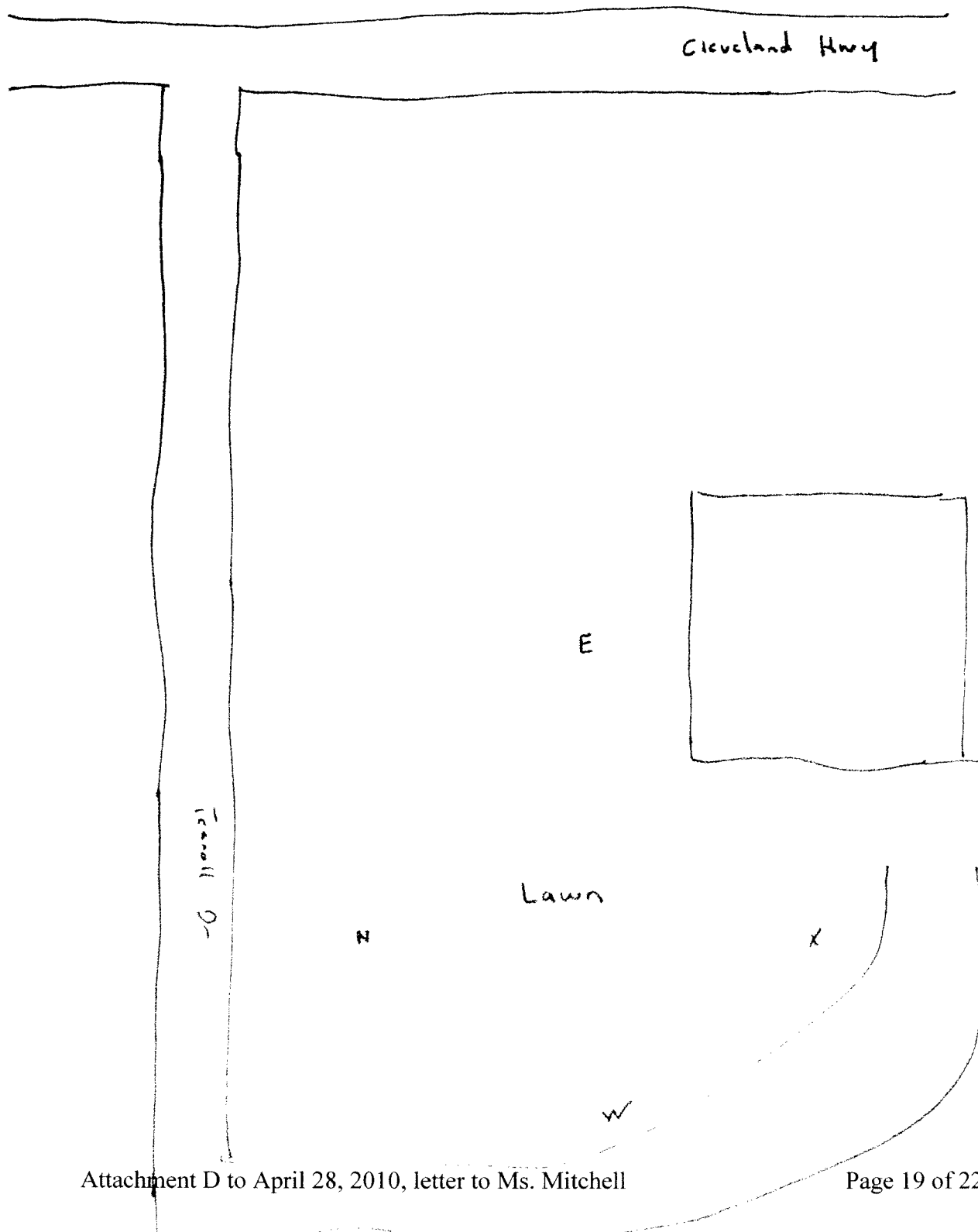
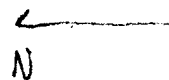
(Tee Roll Dr.)

Dalton, GA

121604-01

Lat: -84.94622519 Long: 34.85192846

Soil Type: Conasauga silt loam 6-10%



162 Ladd Springs Rd

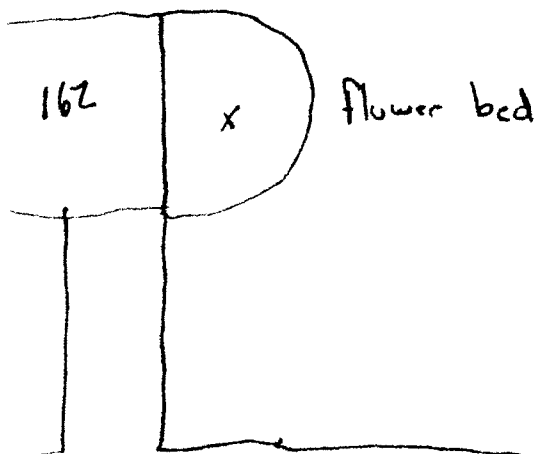
Cleveland, TN

1216 09-02

Lat: -84.82319806 Long: 35.10661753

Soil Types: unavailable

Hwy 313



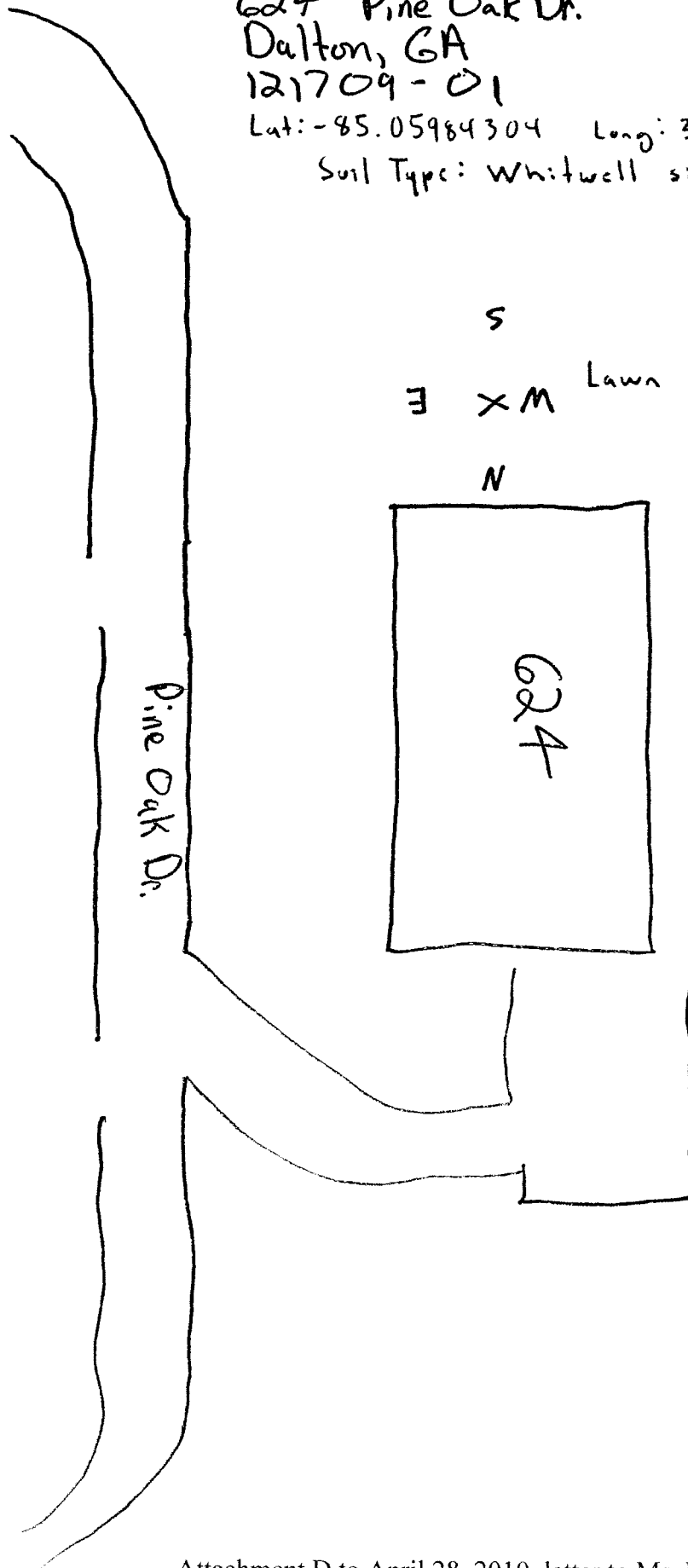
Private Dr.

Ladd
Springs
Rd

624 Pine Oak Dr.
Dalton, GA
121709-01

Lat: -85.05984304 Long: 34.82475037

Soil Type: Whitwell silt loam, occasionally flooded 0-2%



1095 Houston Valley Rd

1ZZ104-01

Lat: -85.08570936 Long: 34.79533703

Soil Type: Chumby silt loam, occasionally flooded 0-2%

